

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION

UNITED STATES OF AMERICA,	)	<u>SUPPLEMENTAL INFORMATION</u>
	)	
Plaintiff,	)	JUDGE SOLOMON OLIVER, JR.
	)	
	)	
v.	)	CASE NO. <u>1:20-CR-00508</u>
	)	Title 18, United States Code,
MARTINO ANDREWS,	)	Sections 371
	)	
Defendant.	)	

FILED  
JUL 20 2022  
CLERK, U.S. DISTRICT COURT  
NORTHERN DISTRICT OF OHIO  
CLEVELAND

COUNT 1

(Conspiracy to Commit Arson, 18 U.S.C. § 371)

The United States Attorney charges:

General Allegations

1. At all times material herein, the Cuyahoga County Department of Public Works was located on 2079 East 9<sup>th</sup> Street, Suite 5-300, in Cleveland, Ohio (“Cuyahoga County Public Works”). Cuyahoga County Public Works is an institution or organization that now receives, and has received in the past, Federal financial assistance.

2. At all times material herein, Cuyahoga County Public Works owned a van, identified as a 1999 Blue Dodge Caravan; County License Plate 6018; Vehicle Identification Number (VIN) 2B4GP25G7XR436398 (“County Van”). The County Van was used by the Cuyahoga County Public Works to conduct its official business.

The Conspiracy

3. On or about May 30, 2020, in the Northern District of Ohio, Eastern Division

Defendant, MARTINO ANDREWS, and others, unknown and not named herein, knowingly and intentionally did combine, conspire, confederate, and agree together and with each other to violate the laws of the United States, to-wit: arson, in violation of Title 18, United States Code, Section 844(f).

Object of the Conspiracy

4. The object of the conspiracy was for Defendant, MARTINO ANDREWS and others, unknown and not named herein, to set fire or attempt to set fire to the County Van.

Manner and Means

5. Among the manner and means by which Defendant, MARTINO ANDREWS and others, unknown and not named herein, carried out the conspiracy were the following:

6. On or about May 30, 2020, ANDREWS and others gathered around the County Van during protests in downtown Cleveland. ANDREWS and others began to vandalize the County Van. During the vandalization, ANDREWS acquired a rag that was on fire, and placed the rag inside the County Van's front driver's side window in an attempt to light the County Van on fire.

7. ANDREWS then grabbed the rag that remained on fire and moved from the front driver's side window to the open fuel tank toward the rear of the County Van. ANDREWS stuffed the rag that remained on fire into the open fuel tank. By bringing an ignition source to the County Van's fuel supply, ANDREWS created a substantial risk of death or serious bodily injury to the individuals in close proximity to the County Van. As the County Van began to erupt in flames, ANDREWS and others near the County Van ran away. The fire in the County Van continued to grow until it was engulfed in flames and destroyed.

Overt Acts

8. In furtherance of the conspiracy and to effect its unlawful objects, Defendant, MARTINO ANDREWS and others, unknown and not named herein, committed the following acts, among others, in the Northern District of Ohio, Eastern Division, and elsewhere:

9. On or about May 30, 2020, ANDREWS placed a burning rag into the County Van's front driver side window in an attempt to light the County Van on fire.

10. On or about May 30, 2020, ANDREWS placed a burning rag into the County Van's open fuel tank in an attempt to light the County Van on fire. ANDREWS was successful in setting the County Van on fire, and that fire created a substantial risk of death or serious bodily injury to individuals other than ANDREWS.

All in violation of Title 18, Section 371 of the United States Code.

MICHELLE M. BAEPPLE  
First Assistant United States Attorney

By:



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ROBERT J. PATTON  
Chief, Violent Crimes Unit